

The Honorable Kymberly K. Evanson

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

JOLENE FURDEK and JONATHAN RYAN,  
on behalf of themselves and all others similarly  
situated,

## Plaintiffs,

V.

AMAZON.COM, INC., a Delaware corporation, and APPLE INC., a California corporation,

## Defendants.

Case No. 2:22-cv-01599-KKE

**PLAINTIFFS' RESPONSE TO  
DEFENDANTS' MOTION FOR  
ATTORNEYS' FEES AND COSTS**

## **NOTE ON MOTION CALENDAR:**

May 23, 2025

1 Counsel for Plaintiffs respectfully offer this response to Defendants' motion for fees and  
 2 costs.

3 Plaintiffs' counsel will not oppose payment of the fees and costs Defendants have  
 4 requested.

5 We respect the Court's judgment and concerns and, with hindsight, recognize the  
 6 situation could have been handled better. Plaintiffs' counsel will redouble their efforts to ensure  
 7 that this case is conducted with the highest degree of professionalism by all involved. The Court  
 8 should take confidence, based on the reputation Plaintiffs' counsel have built through nearly  
 9 forty years of practice, which includes many complicated class actions in this district and  
 10 throughout the nation, that this will be done.

11 DATED: May 19, 2025

Respectfully submitted,

12 HAGENS BERMAN SOBOL SHAPIRO LLP

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1 I certify that this brief contains 105 words, in compliance with the Local Civil Rules.  
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4 /s/ Steve W. Berman  
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Steve W. Berman

1                   **CERTIFICATE OF SERVICE**

2                   I hereby certify that on May 19, 2025, a true and correct copy of the foregoing was filed  
3 electronically by CM/ECF, which caused notice to be sent to all counsel of record.

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6                   Steve W. Berman  
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